

**United States District Court
Southern District of New York**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to: *Salvo v. Al Qaeda Islamic Army, et al., 03 CV 5071*

**MOTION TO WITHDRAW AS ATTORNEY OF RECORD
FOR PLAINTIFF, GLADYS SALVO**

Now comes Donald J. Nolan, individually and on behalf of Nolan Law Group, and pursuant to Local Civil Rule 1.4 requests that this Court enter an order allowing him to withdraw as attorney of record for the plaintiff, Gladys H. Salvo, as administrator of the estate of Samuel Salvo, deceased, and on behalf of all survivors of Samuel Salvo, and in support thereof, states as follows:

1. The complaint in the matter of *Salvo v. Al Qaeda Islamic Army, et al.*, case number 03 CV 5071 was filed by Donald J. Nolan of Nolan Law Group as attorney of record for the plaintiff, Gladys Salvo, on July 8, 2003.
2. On September 5, 2003, Donald J. Nolan of Nolan Law Group filed a Consolidated First Amended Master Complaint as attorney of record for additional plaintiffs, Christine R. Huhn, Lynn B. Pescherine, Linda E. Thorpe, Clifford Tempesta and Dorothy Tempesta.
3. On December 29, 2005, attorney Floyd A. Wisner, a former associate at Nolan Law Group faxed to Nolan Law Group a letter dated December 13, 2005 and signed by Gladys Salvo terminating her relationship with Donald J. Nolan and Nolan Law Group, and which further advised that she should not be contacted and an attorney would be contacting Donald J.

Nolan to arrange for the substitution of attorneys for Gladys Salvo. (See Exhibit A).

4. Despite requests by Donald J. Nolan and Nolan Law Group, no proposed substitution has been forwarded by Mr. Wisner or any other attorney on behalf of Gladys Salvo.

5. Upon information and belief, Mr. Wisner is not currently registered for electronic filing in the Southern District of New York, and therefore a copy of this motion is being sent to him via U.S. Mail at the address listed on fax communication of Wisner Law Firm, 934 S. 4th St., St. Charles, IL 60174.

WHEREFORE, Donald J. Nolan, individually and on behalf of Nolan Law Group, prays that this Court enter an order allowing him to withdraw as attorney of record for the plaintiff, Gladys H. Salvo, as administrator of the estate of Samuel Salvo, deceased, and on behalf of all survivors of Samuel Salvo, and that he continue as attorney of record for the other named plaintiffs in this action..

Respectfully submitted,

Dated: April 10, 2006

/s/ Donald J. Nolan _____
Donald J. Nolan, Esq.
NOLAN LAW GROUP
20 North Clark Street
30th Floor
Chicago, Illinois 60602-4109
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CERTIFICATE OF SERVICE

I, Donald J. Nolan, do hereby certify that I served the within Motion to Withdraw as Attorney of Record for Plaintiff, Gladys Salvo, and the corresponding proposed order on all parties in the case via filing with the Court's electronic case filing (ECF) system and upon the following counsel by depositing the same in the U.S. Mail at 20 North Clark St., Chicago, IL with postage prepaid this 10th day of April 2006:

Floyd A. Wisner
Wisner Law Firm
934 S. 4th St.
St. Charles, IL 60174

/s/ Donald J. Nolan

Donald J. Nolan